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signature page]**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

vs.

DISH NETWORK CORPORATION;
DISH NETWORK L.L.C.; DISH
NETWORK SERVICE L.L.C.; AND
DISH NETWORK CALIFORNIA
SERVICE CORPORATION,

Defendants.

fgh

Case No.: 2:23-cv-01043-JWH-KES

[Assigned to the Hon. John W.
Holcomb]

**JOINT STIPULATION
REGARDING VENUE DISCOVERY
AND BRIEFING SCHEDULE FOR
DEFENDANTS DISH NETWORK
CORPORATION, DISH NETWORK
L.L.C., AND DISH NETWORK
SERVICE L.L.C.'S MOTION TO
DISMISS**

Current Hearing Date: June 9, 2023

Proposed New Date: August 25, 2023

1 Plaintiff Entropic Communications, LLC (“Plaintiff” or “Entropic”) and
2 Defendants DISH Network Corporation, DISH Network L.L.C., Dish Network Service
3 L.L.C., and DISH Network California Service Corporation (collectively, “Defendants”)
4 (collectively with Entropic, the “Parties”), by and through their respective counsel,
5 stipulate and agree as follows:

6 WHEREAS, Defendants DISH Network Corporation, DISH Network L.L.C.,
7 and Dish Network Service L.L.C. (collectively, “DISH Colorado”) filed a Motion to
8 Dismiss for Improper Venue (the “Motion”) on May 8, 2023 [ECF 49];

9 WHEREAS, the Motion asserts that Entropic has not met its evidentiary burden
10 to show that the Central District of California is a proper venue for this action as to
11 DISH Colorado;

12 WHEREAS, Entropic seeks to conduct venue discovery to respond to the
13 arguments presented in the DISH Colorado Motion; particularly to investigate whether
14 DISH Colorado has a regular and established place of business in the Central District
15 of California and therefore whether venue in this District is proper under 28 U.S.C.
16 § 1400(b);

17 WHEREAS, the Parties agree to conduct venue discovery limited to the
18 arguments presented in the DISH Colorado Motion;

19 WHEREAS, the Parties acknowledge that Entropic cannot conduct venue
20 discovery and file its Opposition to the Motion by the current deadline of May 19, 2023;

21 NOW THEREFORE, the Parties, by and through their respective counsel, hereby
22 STIPULATE AND AGREE as follows:

23 1. Entropic is permitted to conduct venue discovery, consisting of, at most,
24 two depositions (one of which will be a deposition of Defendants under Rule 30(b)(6)
25 of the Federal Rules of Civil Procedure, one of which will be of the declarant in the
26 DISH Colorado Motion, Dan Minnick); four special interrogatories; and seven requests
27 for production of documents. This discovery will be limited in scope and relate to
28

1 questions regarding the Defendant entities' presence in California, the corporate
2 relationship between all of the Defendant entities, the management of each Defendant
3 entity, the management of the employees of the DISH Network California Service
4 Corporation entity, and the relationship between the Defendant entities and their
5 authorized retailers in the District. The normal and customary Federal Rules of Civil
6 Procedure covering discovery shall apply.

7 2. Should Entropic provide a declaration in support of its opposition to the
8 Motion, DISH Colorado shall be permitted to conduct venue discovery related to the
9 declaration, and the Parties agree that in such event they will negotiate a further
10 extension to the schedule as warranted.

11 3. The Parties' venue discovery will not count against the discovery limits as
12 set forth under the Federal Rules of Civil Procedure or any future discovery order of the
13 Court. Entropic and Defendant will be entitled to the full scope of discovery as to the
14 merits of this action notwithstanding the venue discovery it propounds.

15 4. The Parties reserve the right to move to strike or seek protective order over
16 any discovery sought by the other party that relates to any issue besides the venue issues
17 raised in the DISH Colorado Motion.

18 5. The Parties respectfully request that the Court agree to continue the hearing
19 on the DISH Colorado Motion from June 9, 2023 to August 25, 2023.

20 6. Consistent with the proposed new hearing date, the Parties respectfully
21 request that Plaintiff's deadline to oppose the DISH Colorado Motion be continued to
22 July 28, 2023, and that Defendants' deadline to file a reply be continued to August 11,
23 2023.

24
25 Dated: May 12, 2023

Respectfully Submitted,

26 By: /s/ Connor J. Meggs
27 Christina N. Goodrich (SBN 261722)
28 Connor J. Meggs (SBN 336159)

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Dated: May 12, 2023

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SIGNATURE CERTIFICATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Connor J. Meggs, attest that all other signatories listed above concur in this filing's content and have authorized the filing.

Dated: May 12, 2023

/s/ Connor J. Meggs